

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	WC Docket No. 10-90
Connect America Fund	)	

**A-CAM COMPETITIVE CHALLENGE**

**COMMENTS OF GRAND RIVER MUTUAL TELEPHONE CORPORATION  
CHALLENGING A-CAM COMPETITORS PURSUANT TO PUBLIC NOTICE**

Grand River Mutual Telephone Corporation (“Grand River” or the “Company”) hereby submits these comments regarding the Federal Communications Commission’s (“FCC” or “Commission”) April 7, 2016 Public Notice which published the preliminary determination of unsubsidized competitive coverage for rate-of-return Incumbent Local Exchange Carrier (“ILEC”) study areas.<sup>1</sup>

Pursuant to the *Public Notice* and paragraph 71 the Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking released on March 30, 2016 in the above-reference proceedings by the Federal Communications Commission (“FCC” or “Commission”),<sup>2</sup> Grand River hereby challenges the competitive coverage in certain census blocks contained in the latest version of the A-CAM model (ver. 2.2).

**I. BACKGROUND**

Grand River is a rural incumbent local exchange carrier (“RLEC”) serving a large study area in northern Missouri (Study Area Code 421888) and southcentral Iowa (Study Area Code 351888). The challenges in these comments pertain to Grand River’s Missouri study area. The

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<sup>1</sup> See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process to Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) (“*Public Notice*”).

<sup>2</sup> See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, FCC 16-33 (rel. Mar. 30, 2016) (“*USF Reform Order*”).

Company is interested in accepting the voluntary offer of A-CAM support, but is concerned about the accuracy of the model as it is in version 2.2.

As further outlined below, the Company maintains that the latest version of the A-CAM contains errors that are significantly impacting the total number of locations eligible for support by excluding census blocks where Form 477 data erroneously indicates the presence of unsubsidized competitive providers. These errors in the A-CAM model significantly reduces Grand River's potential model-based support.

Through this petition, Grand River is not challenging all competitive overlap information within the A-CAM for its study area, as there are some unsubsidized competitors operating in a few of the Company's census blocks in compliance with the Commission's standards, but there are certain census blocks that contain erroneous competitive overlap findings, which Grand River is seeking to have corrected in the next release of the A-CAM.

## **II. DEMONSTRATION OF ERRONEOUS COMPETITIVE FORM 477 DATA**

In regard to unsubsidized competitors identified in certain census blocks within Grand River's study area in the latest A-CAM, the Company submits these challenges based primarily on grounds that the entities detailed below do not provide broadband service at 10/1 Mbps within Grand River's study area.

As the FCC noted in its *USF Reform Order*, in order to be considered an unsubsidized competitor, a provider must offer broadband service that is at least capable of providing 10/1 Mbps service within a rate-of-return carrier's study area.<sup>3</sup> However, as further addressed below, the identified competitive provider does not offer broadband service in census blocks within the Company's study area.

### **a. AT&T Services, Inc.**

According to the A-CAM, AT&T offers DSL service (technology code 12) in one of Grand River's census blocks (290799602002004), which is not accurate. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by AT&T (data as of June 30, 2015). As confirmed by the attached declarations from representatives of Grand River (Attachment A), AT&T does not offer broadband service capable of 10/1 Mbps in Grand River's study area. Grand

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<sup>3</sup> *USF Reform Order* at footnote 31.

River believes that AT&T erroneously reported this census block in its Form 477, as it is situated far from anywhere that AT&T has high-speed broadband. In the next release of the A-CAM, this census block should be not be shown as a “knock out” by AT&T.

**b. Suddenlink Communications**

According to the A-CAM, Suddenlink offers cable modem service (technology code 42) in one of Grand River’s census blocks (290799601002134), which is not accurate. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Suddenlink (data as of June 30, 2015). As confirmed by the attached declaration from representatives of Grand River (Attachment B), Suddenlink does not offer broadband service capable of 10/1 Mbps in this census block in the Company’s study area. The Grand River District Manager inspected the census block and found no evidence of coax on poles or pedestals, and no visible lines going into residences in the block. The Company has seen no evidence of Suddenlink marketing in this area. In the next release of the A-CAM, this census block should be not be shown as a “knock out” by Suddenlink.

**c. MCC Missouri LLC**

According to the A-CAM, MCC Missouri offers cable modem service (technology code 42) in three of Grand River’s census blocks (290819502001250, 290819502002016, and 290819502003053), which is not accurate. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by MCC Missouri (data as of June 30, 2015). As confirmed by the attached declaration from representatives of Grand River (Attachment C), MCC Missouri does not offer broadband service capable of 10/1 Mbps in these census blocks in the Company’s study area. Representatives from Grand River investigated MCC Missouri’s service claims in these census blocks and found no evidence of service. MCC Missouri does not respond to locate calls in these census blocks, they do not advertise service offerings there, and MCC Missouri representatives confirmed in service inquiry calls that no service is available in these blocks. In the next release of the A-CAM, this census block should be not be shown as a “knock out” by MCC Missouri.

**d. Northeast Missouri Rural Telephone Company**

According to the A-CAM, Northeast Missouri Rural Telephone Company (“NEMR”) offers FTTH service (technology code 50) in one of Grand River’s census blocks (291719601001407), which is not accurate. **This is not a “split block”**, it is completely isolated inside Grand River’s study area (see map, Attachment D). The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by NEMR (data as of June 30, 2015). As confirmed by the attached declaration from representatives of NEMR (Attachment E), NEMR does not offer broadband service capable of 10/1 Mbps in Grand River’s study area. Grand River believes that NEMR erroneously reported this census block in its Form 477, as it is situated far from anywhere that NEMR has high-speed broadband. In the next release of the A-CAM, this census block should be not be shown as a “knock out” by NEMR.

**III. CONCLUSION**

For the reasons stated above, Grand River respectfully requests, pursuant to the *Public Notice* and paragraph 71 of the *USF Reform Order*, that the Commission find the evidence submitted herein to be sufficient to correct the erroneous exclusion of certain census blocks in the latest A-CAM such that Grand River can make an informed decision as to whether or not it wishes to opt for model-based support and to such other relief, as the Company may be justly entitled.

Respectfully submitted,

/s/      *Ronald T. Hinds,*  
Chief Executive Officer

Filed April 28, 2016

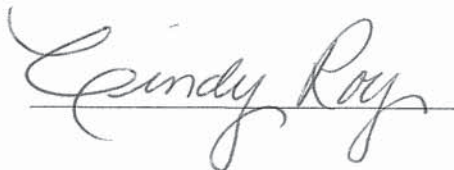
Attachments

**DECLARATION OF CINDY ROY**

I, Cindy Roy, am Marketing Representative of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with AT&T Services, Inc. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I have lived in this census block for over twelve years, and in the past I was able to subscribe to AT&T landline telephone but have never been able to receive AT&T broadband internet. I called AT&T on April 26, 2016 at 3:35 to request internet and was told U-Verse is not available in my area. The representative did offer me a wireless hotspot. Further, I have no knowledge of any advertising or offering of internet service by AT&T in this area. I verify that AT&T Services, Inc. does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290799602002004 census block.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in cursive script that reads "Cindy Roy". The signature is written in dark ink and is positioned above a horizontal line.

Cindy Roy, Marketing Representative  
Grand River Mutual Telephone Corporation

**DECLARATION OF JENNIFER NEFF**

I, Jennifer Neff, am Director of Human Resources and Regulatory Affairs of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with AT&T Services, Inc. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. On April 20, I used the AT&T availability tool on their website to check for availability in that area. I input the addresses of our current and former customers in that block, as well as the address of our employee and her neighbors who live in that block but not in our service area. The website tool showed "Internet is not available" to any of the addresses (see attached). I verify that AT&T Services, Inc. does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290799602002004 census block.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in black ink, appearing to read "Jennifer Neff", is written over a horizontal line.

Jennifer Neff, Director of Human Resources and Regulatory Affairs  
Grand River Mutual Telephone Corporation



DECLARATION OF STEVEN MILES

I, Steven Miles, am a District Manager of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with AT&T Services, Inc. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I have worked in this area for sixteen years, over seven years as a technician and almost nine years as a manager. Further, I have no knowledge of any advertising or offering of internet service by AT&T in this area. I verify that AT&T Services, Inc. does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290799602002004 census block.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in cursive script that reads "Steven Miles". The signature is written in dark ink and is positioned above a horizontal line.

Steven Miles, District Manager  
Grand River Mutual Telephone Corporation

## ATTACHMENT A

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<p><b>\$50</b> /mo. for 12 mos. Requires 24 mo. agmt., other qual. Svc. &amp; combined bill. <a href="#">See offer details</a></p> <p>All Included Package</p> <p><b>145</b> Channels</p> <p></p> <p><a href="#">Compare DIRECTV packages</a></p> <p><a href="http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf">http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf</a></p> <p><b>Plan Features</b></p> <ul style="list-style-type: none"> <li>INCLUDED! Monthly equipment fees for up to 4 rooms</li> <li>INCLUDED! HD DVR monthly service</li> <li>Add HBO®, SHOWTIME®, STARZ®, and Cinemax® and the first three months are on us!</li> <li>Save \$10/mo. by combining DIRECTV and wireless services on a single AT&amp;T bill</li> </ul> <p><a href="#">Add to Cart</a></p>	<p><b>\$60</b> /mo. for 12 mos. Requires 24 mo. agmt., other qual. Svc. &amp; combined bill. Regional Sports Fee applies in certain markets. <a href="#">See offer details</a></p> <p>All Included Package</p> <p><b>175</b> Channels</p> <p></p> <p><a href="#">Compare DIRECTV packages</a></p> <p><a href="http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf">http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf</a></p> <p><b>Plan Features</b></p> <ul style="list-style-type: none"> <li>INCLUDED! Monthly equipment fees for up to 4 rooms</li> <li>INCLUDED! HD DVR monthly service</li> <li>INCLUDED! NFL SUNDAY TICKET 2016 season at no extra cost</li> <li>Add HBO®, SHOWTIME®, STARZ®, and Cinemax® and the first three months are on us!</li> </ul> <p><a href="#">Add to Cart</a></p>	<p><b>\$75</b> /mo. for 12 mos. Requires 24 mo. agmt., other qual. Svc. &amp; combined bill. Regional Sports Fee applies in certain markets. <a href="#">See offer details</a></p> <p>All Included Package</p> <p><b>240</b> Channels</p> <p></p> <p><a href="#">Compare DIRECTV packages</a></p> <p><a href="http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf">http://www.att.com/Common/PDF/DIRECTV_English_Channel_Lineup.pdf</a></p> <p><b>Plan Features</b></p> <ul style="list-style-type: none"> <li>INCLUDED! Monthly equipment fees for up to 4 rooms</li> <li>INCLUDED! HD DVR monthly service</li> <li>INCLUDED! NFL SUNDAY TICKET 2016 season at no extra cost</li> <li>Add HBO®, SHOWTIME®, STARZ®, and Cinemax® and the first three months are on us!</li> </ul> <p><a href="#">Add to Cart</a></p>

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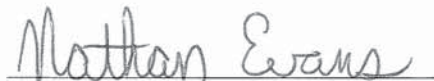


**DECLARATION OF NATHAN EVANS**

I, Nathan Evans, am a District Manager of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with Suddenlink Communications. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I have worked for Grand River for seven years, and for the last four years I have been the district manager for this area. I have personally inspected the census block to verify Suddenlink has no coax on poles or pedestals in this census block. I have also verified there are no visible service lines going into each residence in this census block. Further, I have no knowledge of any advertising or offering of internet service by Suddenlink in this area. I verify that Suddenlink Communications does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290799601002134 census block.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in cursive script that reads "Nathan Evans". The signature is written in dark ink and is positioned above a horizontal line.

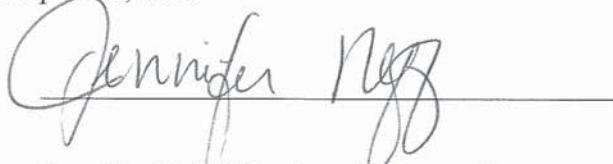
Nathan Evans, District Manager  
Grand River Mutual Telephone Corporation

**DECLARATION OF JENNIFER NEFF**

I, Jennifer Neff, am Director of Human Resources and Regulatory Affairs of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with MCC Missouri, LLC (Mediacom). Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. On April 20, I used the Mediacom availability tool on their website to check for availability in that area. I input the addresses of our current and former customers in each of the blocks. The website tool showed "Our apologies, but we still can't find our address. Because we do service your zip code, it's possible you can still get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773" for all but one of the addresses (see attached). On April 20, I called this number twice. The first time, I gave the zip code and then an address and the representative stated "at this time we don't service that area". The second time, when I gave the representative the zip code I stated the place was outside of town. The representative immediately said "I'm sorry but we can't serve you outside the city limits." I asked if that applied to just this town and she said "No, we don't serve outside the city limits of any town." I verify that Mediacom does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290819502001250, 290819502002016, and 290819502003053 census blocks.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in cursive script, reading "Jennifer Neff", is written over a horizontal line.

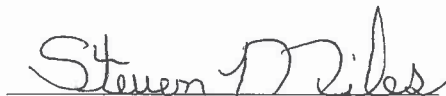
Jennifer Neff, Director of Human Resources and Regulatory Affairs  
Grand River Mutual Telephone Corporation

DECLARATION OF STEVEN MILES

I, Steven Miles, am a District Manager of Grand River Mutual Telephone Corporation ("Grand River" or the "Company"). I have personal and direct knowledge of the representations made by Grand River in its April 28, 2016 Comments to the Federal Communications Commission regarding the Company's service area and competitive overlap with MCC Missouri LLC (Mediacom). Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I was born and raised in the Bethany area, left for awhile, and have lived in the house I now own in Bethany for over 20 years. I have worked for Grand River in this area for sixteen years, over seven years as a technician and almost nine years as a manager. Through my work experience, I have personal knowledge that Mediacom does not have facilities in these census blocks outside the city limits, and Mediacom does not respond to Missouri One Call calls for locates in these census blocks. Further, I have no knowledge of any advertising or offering of internet service by Mediacom outside the city limits. I verify that Mediacom does not provide broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area in the 290819502001250, 290819502002016, and 290819502003053 census blocks.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in black ink that reads "Steven Miles". The signature is written in a cursive style and is positioned above a horizontal line.

Steven Miles, District Manager  
Grand River Mutual Telephone Corporation

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Investor Relations ( <a href="http://phx.corporate-ir.net/phoenix.zhtml?c=98270&amp;p=irol-IRHome">http://phx.corporate-ir.net/phoenix.zhtml?c=98270&amp;p=irol-IRHome</a> )	TV ( <a href="http://mediacomcable.com/site/video.htm">http://mediacomcable.com/site/video.htm</a> )	Web Mail ( <a href="http://mediacomtoday.com/files/mediacom/login_f">http://mediacomtoday.com/files/mediacom/login_f</a> )
Careers ( <a href="http://mediacomcable.com/site/about_careers.html">http://mediacomcable.com/site/about_careers.html</a> )	TiVo ( <a href="http://mediacomcable.com/site/tivo.htm">http://mediacomcable.com/site/tivo.htm</a> )	My Account ( <a href="https://mdcom.convergentcare.com/mdcom/validateaction=initialize">https://mdcom.convergentcare.com/mdcom/validateaction=initialize</a> )
News ( <a href="http://mediacomcable.com/site/about_news.htm">http://mediacomcable.com/site/about_news.htm</a> )	DVR ( <a href="http://mediacomcable.com/site/video_dvr.htm">http://mediacomcable.com/site/video_dvr.htm</a> )	Support ( <a href="http://support.mediacomcable.com">http://support.mediacomcable.com</a> )
Advertise On Mediacom ( <a href="http://www.onmediaadsales.com/">http://www.onmediaadsales.com/</a> )	Home Security ( <a href="http://mediacomcable.com/site/home_security.htm">http://mediacomcable.com/site/home_security.htm</a> )	Contact Us ( <a href="http://mediacomcable.com/site/about_contact.php">http://mediacomcable.com/site/about_contact.php</a> )
Digital Rollout ( <a href="http://mediacomcable.com/site/getdigital.htm">http://mediacomcable.com/site/getdigital.htm</a> )	Phone ( <a href="http://mediacomcable.com/site/phone.html">http://mediacomcable.com/site/phone.html</a> )	
Parental Controls ( <a href="http://mediacomcable.com/site/parental_controls.htm">http://mediacomcable.com/site/parental_controls.htm</a> )	International Calling ( <a href="http://mediacomcable.com/site/phone_international.html">http://mediacomcable.com/site/phone_international.html</a> )	
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you can get Mediacom services. Please call today  
to see if Mediacom services are available to you:  
844-FULL-SPEED (844-385-5773).

Let's check what special offers we have at your  
address

15547 W. State Hwy F	optional Apt/Unit #	64424
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Investor Relations (http://phx.corporate-ir.net/phoenix.zhtml?c=98270&p=irol-IRHome)	TV (http://mediacomcable.com/site/video_tv.html)	Web Mail (http://mediacomtoday.com/files/mediacom/login_r.html)
Careers (http://mediacomcable.com/site/about_contact.php?user=MediacomCable/feed)	TiVo (http://mediacomcable.com/site/tivo.html)	My Account (https://mdcom.convergentcare.com/mdcom/validate?action=initialize)
News (http://mediacomcable.com/site/about_news.html)	DVR (http://mediacomcable.com/site/video_dvr.html)	Support (http://support.mediacomcable.com)
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Our apologies, but we still can't find your address.  
 Because we do service your zip code, it's possible  
 you can get Mediacom services. Please call today  
 to see if Mediacom services are available to you:  
 844-FULL-SPEED (844-385-5773).

Let's check what special offers we have at your  
 address

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Investor Relations (http://phx.corporate-ir.net/phoenix.zhtml?c=98270&p=irol-IRHome)	TV (http://mediacomcable.com/site/video.html)	Web Mail (http://mediacomtoday.com/files/mediacom/login_r.html)
Careers (http://mediacomcable.com/site/about_contact.php)	TiVo (http://mediacomcable.com/site/tivo.html)	My Account (https://mdcom.convergentcare.com/mdcom/validate?action=initialize)
News (http://mediacomcable.com/site/about_news.html)	DVR (http://mediacomcable.com/site/video_dvr.html)	Support (http://support.mediacomcable.com)
Advertise On Mediacom (http://www.onmediaadsales.com/)	Home Security (http://mediacomcable.com/site/home_security.html)	Contact Us (http://mediacomcable.com/site/about_contact.php)
Digital Rollout (http://mediacomcable.com/site/getdigital.html)	Phone (http://mediacomcable.com/site/phone.html)	
Parental Controls (http://mediacomcable.com/site/parental_controls.html)	International Calling (http://mediacomcable.com/site/phone_international.html)	
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Our apologies, but we still can't find your address.  
 Because we do service your zip code, it's possible  
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 844-FULL-SPEED (844-385-5773).

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 address

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Investor Relations (http://phx.corporate-ir.net/phoenix.zhtml?c=98270&p=irol-IRHome)	TV (http://mediacomcable.com/site/video.html)	Web Mail (http://mediacomtoday.com/files/mediacom/login_r)
Careers (http://mediacomcable.com/site/about_careers.html)	TiVo (http://mediacomcable.com/site/tivo.html)	My Account (https://mdcom.convergentcare.com/mdcom/validateaction=initialize)
News (http://mediacomcable.com/site/about_news.html)	DVR (http://mediacomcable.com/site/video_dvr.html)	Support (http://support.mediacomcable.com)
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 address

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Investor Relations ( <a href="http://phx.corporate-ir.net/phoenix.zhtml?c=98270&amp;p=irol-IRHome">http://phx.corporate-ir.net/phoenix.zhtml?c=98270&amp;p=irol-IRHome</a> )	TV ( <a href="http://mediacomcable.com/site/video.html">http://mediacomcable.com/site/video.html</a> )	Web Mail ( <a href="http://mediacomtoday.com/files/mediacom/login_r">http://mediacomtoday.com/files/mediacom/login_r</a> )
Careers ( <a href="http://mediacomcable.com/site/about_careers.html">http://mediacomcable.com/site/about_careers.html</a> )	TiVo ( <a href="http://mediacomcable.com/site/tivo.html">http://mediacomcable.com/site/tivo.html</a> )	My Account ( <a href="https://mdcom.convergentcare.com/mdcom/validate?action=initialize">https://mdcom.convergentcare.com/mdcom/validate?action=initialize</a> )
News ( <a href="http://mediacomcable.com/site/about_news.html">http://mediacomcable.com/site/about_news.html</a> )	DVR ( <a href="http://mediacomcable.com/site/video_dvr.html">http://mediacomcable.com/site/video_dvr.html</a> )	Support ( <a href="http://support.mediacomcable.com">http://support.mediacomcable.com</a> )
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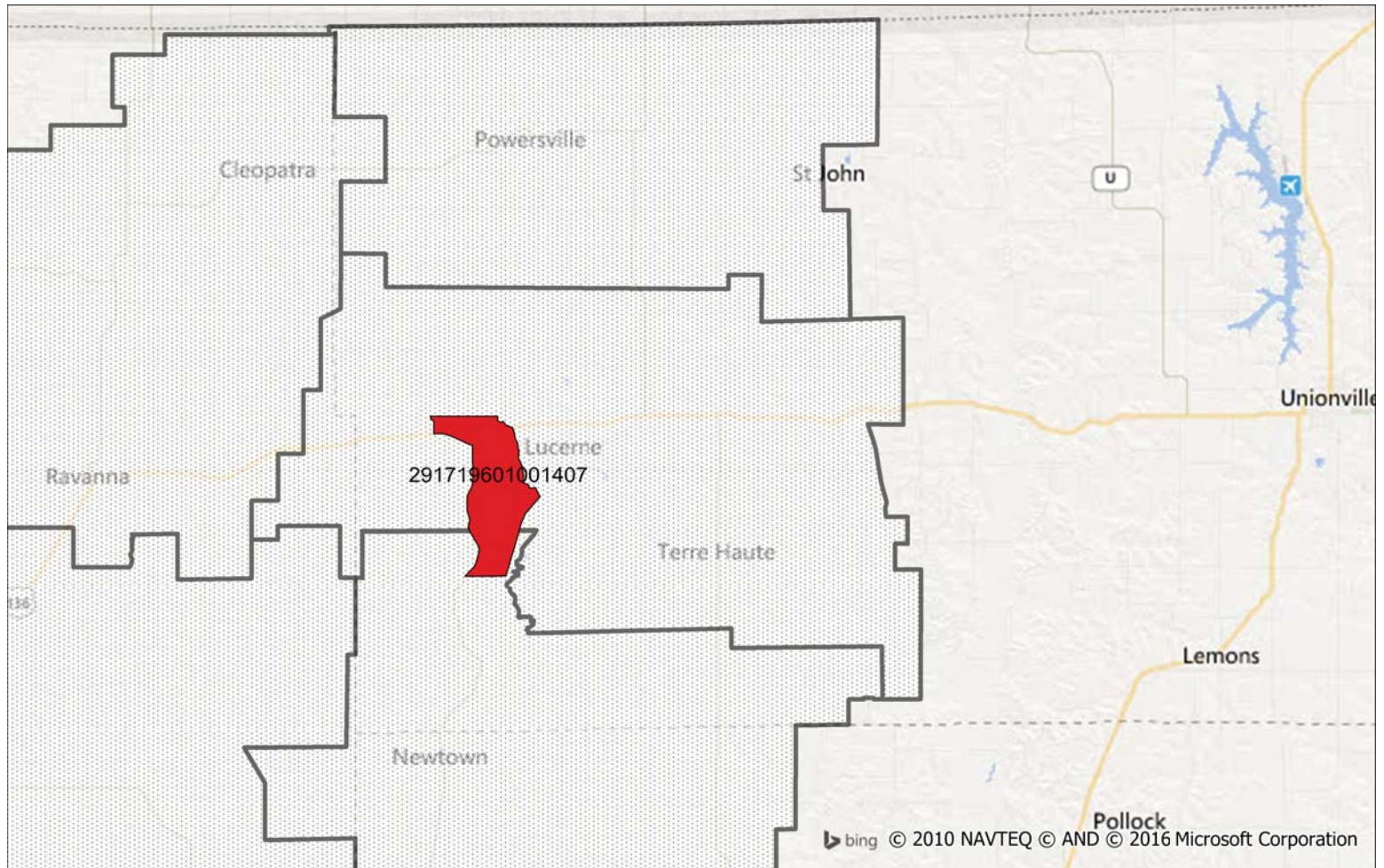
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**DECLARATION OF JAMES E. SHERBURNE**

I, James E. Sherburne, am Chief Executive Officer of Northeast Missouri Rural Telephone Company ("NEMR" or the "Company"). I have personal and direct knowledge of the representations made by Grand River Mutual Telephone Company in its April 28, 2016 Comments to the Federal Communications Commission, WC Docket No. 10-90, regarding the two companies' service areas and competitive overlaps. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that NEMR does not provide 10/1 Mbps broadband service as an unsubsidized competitor in Grand River's incumbent telephone service area, census block 291719601001407. I verify that this census block is situated completely within Grand River's incumbent study area, and NEMR does not have facilities or customers in that census block.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2016

A handwritten signature in cursive script, reading "James E. Sherburne", written in dark ink.

James E. Sherburne, Chief Executive Officer  
Northeast Missouri Rural Telephone Company